

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
CENTRAL DIVISION

**ROY HOLMES, TINA ALEXANDER,
and PATRICK NORRIS, and MELISSA GARNER,
Each Individually and on Behalf of
All Others Similarly Situated**

PLAINTIFFS

vs.

Case No. 4:20-cv-191-DPM

**STETSON COURIER, INC.
and JOHN STETSON**

DEFENDANTS

PLAINTIFFS' MOTION TO REOPEN DISCOVERY

Plaintiffs Roy Holmes, Tina Alexander, Patrick Norris, and Melissa Garner, each individually and on behalf of all others similarly situated, by and through their attorneys of the Sanford Law Firm, PLLC, for their Motion to Reopen Discovery, state as follows:

1. Plaintiffs seek leave to conduct post-judgment discovery pursuant to FRCP 69(a)(2), which states that “the judgment creditor... may obtain discovery from any person—including the judgment debtor—as provided in these rules or by the procedure of the state where the court is located.”

2. This Court entered judgment against Defendants for the benefit of Plaintiffs Roy Holmes, Tina Alexander, Patrick Norris, and Melissa Garner on 29 September 2023. ECF No. 138.

3. Defendant has failed to pay any of the judgment amount. Plaintiffs believe collections efforts will be necessary.

4. The last discovery deadline for this matter concluded on 12 April 2022, with the class claims discovery cutoff. See ECF No. 48.

5. Plaintiffs seek leave to conduct post-judgment discovery in order to locate the assets of Defendants to effectuate the collection of the judgment.

6. Counsel for Plaintiffs has contacted counsel for Defendants regarding Defendants' stance as to this Motion. Defendants have not proffered a clear answer regarding their stance as to this Motion, and so Plaintiffs assume that it is **Opposed**.

WHEREFORE, premises considered, Plaintiffs respectfully request an order of this Court granting them leave to conduct post-judgment discovery, and for such other relief as may be just and proper.

Respectfully submitted,

**ROY HOLMES, TINA ALEXANDER,
PATRICK NORRIS and MELISSA
GARNER, PLAINTIFFS**

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